

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

AMERICAN COUNCIL OF LEARNED
SOCIETIES, *et al.*,

Plaintiffs,
v.

MICHAEL MCDONALD, in his official
capacity as Acting Chairman of the National
Endowment for the Humanities, *et al.*,

Defendants.

Case No. 1:25-cv-03657

SUPPLEMENTAL DECLARATION OF JAMES GROSSMAN

I, James Grossman, declare as follows:

1. I am James Grossman, Executive Director at the American Historical Association (AHA). I previously submitted a declaration in support of Plaintiffs' motion for a preliminary injunction. My prior declaration explained the consequences of NEH's recent dismantling and termination of funding opportunities on AHA's mission.

2. I now submit this supplemental declaration to address specifically the NEH grant programs that AHA would have applied to had they not recently been eliminated.

3. Among the grant programs that were recently eliminated, AHA would have applied to: (i) Institutes for Higher Education Faculty, (ii) Institutes for K-12 Educators, and (iii) State and Impact of the Humanities.

4. The AHA had previously applied for and been awarded grants for both an Institute for Higher Education Faculty and an Institute for K-12 Educators, both of which were terminated in April 2025. We planned to apply for such Institutes on a regular basis to support the professional development of higher ed and K-12 instructors.

5. The AHA planned to apply for a State and Impact of the Humanities grant opportunity through the Office of Data and Evaluation. The proposal would have requested funding to support a project focused on the collection and analysis of data documenting the expansion of dual enrollment programs that offer undergraduate credit for secondary school students. Our goal was to better understand how this rapidly expanding modality is reshaping where, when, and how students learn history. Dual enrollment is one of the fastest changing aspects of the way in which students earn credit towards college degree completion. Yet its implications for higher education and secondary school education are understudied and poorly understood, especially with regard to the quality of student learning. Tracking and analyzing dual enrollment is essential to understanding student success and career readiness.

6. The elimination of these grant programs will have a devastating impact on the ability of the AHA to fulfill its mission, as explained in my prior declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 11, 2025, in Washington, DC.

A handwritten signature in black ink, appearing to read "James Grossman", written in a cursive style.

James Grossman